

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

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U.S. DISTRICT COURT
WESTERN DIVISION

Litchfield Financial Corporation)	
Textron Financial Corporation)	
Land Finance Company)	
)	
<i>Plaintiffs</i>)	
v.)	
Buyers Source Real Estate Group)	
Buyers Source Valley Group, LLC)	
Buyers Source Sugarmill, LLC)	
Buyers Source, Savannah Lakes, LLC)	
Thomas H. Brewer)	
Frederick D. Blake)	
Betty M. Brewer)	
Susan Gard)	
Henry Montgomery)	
Lannie Campbell)	
Ronald P. Ferguson)	
Stephen A. Hudgins, Esq.)	
Stephen A. Hudgins, P.C.)	
Hudgins & Stallings, P.C.)	
J. Vance Stallings, Esq.)	
John C. Lumpkin, Esq.)	
John C. Lumpkin, P.C.)	
William Gregory Seigler, Esq.)	
<i>Defendants</i>)	
)	

Civil Action No. 04CV30076KPN

**PLAINTIFFS' MOTION FOR LEAVE TO FILE A MEMORANDUM OF LAW IN
EXCESS OF TWENTY PAGES IN OPPOSITION TO DEFENDANT SEIGLER'S
MOTION TO DISMISS**

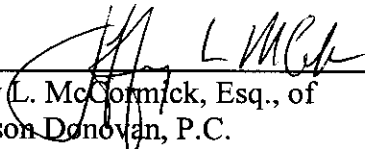
The plaintiffs in the above-captioned matter respectfully request that they be allowed to file herewith a Memorandum of Law in excess of twenty pages in Opposition to the Defendant Seigler's Motion to Dismiss. In support thereof, the plaintiff states that their response is only twenty-two pages in length and necessarily has had to respond to numerous positions set forth by the defendant in his motion. In an effort to address each argument thoroughly in this case involving substantial sums of money and substantial allegations against the defendants, the

plaintiffs have exceeded by a small amount the twenty page limit. The plaintiffs, therefore, respectfully move for leave to file their opposition in excess of the twenty page limit.

Respectfully submitted,

Respectfully Submitted
Counsel for Plaintiffs

LITCHFIELD FINANCIAL COMPANY
TEXTRON FINANCIAL CORPORATION AND
LAND FINANCE COMPANY

By 
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BBO No. 329740

CERTIFICATE OF SERVICE

I, Jeffrey L. McCormick, Esq., hereby certify that on this 3 day of September, 2004, I served a copy of the above upon the parties in the action by mailing, postage prepaid, to counsel, Peter M. Durney, Esq., David M. McGough, Esq., Christine A. Knipper, Esq., Cornell & Gollub, 75 Federal Street, Boston, MA 02110, George R. Moore, Esq., Devine Millimet, 300 Brickstone Square, P.O. Box 39, Andover, MA 01810, Samuel W. Outten, Esq., P.O. Box 10208, Greenville, SC 29603-0208, Thomas H. Brewer and Betty M. Brewer, 113 Northgate Lane, Suffolk, VA 23434, Lannie Campbell, One Harbor Court, #3D, Portsmouth, VA 23704, Henry Montgomery, 396 Baldwin Drive, Howard, OH 43028-8044, Ronald P. Ferguson, 6395 Lake View Drive, Falls Church, VA 22040, and Frederick D. Blake, 705 Mobjack Place, Newport News, VA 23606,

Subscribed under the penalties of perjury.


Jeffrey L. McCormick